

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CLARK LANDIS, et al.,

Plaintiff,

vs.

WASHINGTON STATE MAJOR
LEAGUE BASEBALL STADIUM
PUBLIC FACILITIES DISTRICT, et al,

Defendants.

NO. 2:18-cv-01512-BJR

**DECLARATION OF KAYLA
BROWN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT**

I, KAYLA BROWN, hereby declare as follows,

1. I am over the age of 18 and competent to testify on the matters stated herein.
2. I declare the following information:
3. I am limited in the major life activity of walking and I currently use a motorized wheelchair for mobility.
4. I am a long-time Mariner's fan and I generally attend 1-2 games a season.
5. I attended a game at T-Mobile Park on May 6, 2018, and attended a game in the 2019 season.

- 1 6. I have purchased tickets for wheelchair accessible seats at the rear of the 100 level and
2 my view of the field is obstructed by the shoulders and heads of standing spectators
3 directly in front of me as well as the heads of people standing two rows in front of me.
- 4 7. If sightlines are improved in the seats at the rear of the 100 level I will purchase tickets in
5 that area and sit there.
- 6 8. From the wheelchair accessible seats at the rear of the 100 level seating at T-Mobile Park
7 my views of the sun, sky, fly balls, home run fireworks, and the scoreboard have been
8 partially or fully obscured.
- 9 9. I have never had the opportunity to catch a fly ball at T-Mobile Park from the accessible
10 seating or any other part of the stadium I am able to access.
- 11 10. If wheelchair accessible seats are made available closer to the field on the 100 level,
12 including in the outfield sections, I will purchase those tickets and sit in those locations.
- 13 11. I have experienced many hazardous bumps, cracks, and ledges traveling throughout the
14 stadium, particularly in "The 'Pen" area.
- 15 12. I have had to cross multiple expansion joints in order to reach my wheelchair accessible
16 seats, and the abrupt jolt wheelchairs receive when crossing expansion joints feels jarring
17 and would be dangerous under certain circumstances. I am forced to fill my beverage
18 cups only $\frac{3}{4}$ full in order to prevent spillage when crossing expansion joints.
- 19 13. I have had no way to reach my seating locations without crossing expansion joints.
- 20 14. Some lines for concession vendors are set up to be too narrow for me to access the
21 vendor in my wheelchair. The last place I remember a line set up too narrow was near
22 the bullpen area.
- 23

1 15. I have not been to Edgar's Cantina, but I am aware that the lift is potentially dangerous
2 and that there is no wheelchair accessible dining tables or counters with field views. I will
3 go to Edgar's Cantina when there is a safe and functioning lift and accessible seating with
4 views of the field. My mother likes to go there and I would like to go there with her.

5 16. If a wheelchair accessible route into the dugout was available for a tour or other public
6 event I would certainly be excited to enter the dugout.

7 17. I like to watch the game from the bullpen area and am unable to see over or use the
8 guardrail counters by the bullpen.

9
10 I declare under penalty of perjury that the foregoing is true and correct to the best of
11 knowledge and belief.

12
13 DATED 5/20/2019

14
15 DocuSigned by:
Kayla Brown
BCFC02D395CF411...

16 Kayla Brown

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2
3
4 CERTIFICATE OF SERVICE

5 I, Michael Terasaki, hereby certify under penalty of perjury under the laws of the
6 State of Washington, that on the day set forth below, I electronically filed the foregoing with the
7 Clerk of the Court using the CM/ECF system which will send notification of such filing to the
8 attorneys of record for the defendants.
9

10 Signed at Seattle, Washington this 20th day of May, 2019.
11

12
13 s/Michael Terasaki
14 Michael Terasaki

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